

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

CIVIL ACTION

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

No. 3:17-CV-2183

**PLAINTIFF'S REQUEST FOR THE PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANT**

Pursuant to Federal Rules of Civil Procedure 33 and 34, Plaintiff Robert Stoud hereby requests Defendant to produce the documents described herein, in accordance with the provisions of Federal Rules of Civil Procedure 26 and 34 and the enclosed instructions.

INSTRUCTIONS

1. Prepare a response to this request for the production of documents that separately replies to each of the numbered descriptions of documents set forth in the section below.
2. Clearly indicate in each reply the number of the description you are addressing, which document (s) or portions (s) of a document described therein you agree to produce, and/or which document (s) or portion (s) of documents that you object to producing.

3. In the event that you object to producing a document or a portion of a document in a reply, also state therein for each such document or portion of a document, all of the reasons for your objection.
4. This request for production is continuing. If at any time after service of your response to this request, you become aware that one of your replies is incomplete or incorrect, please promptly serve a suitable supplemental response.
5. If a document exists that is protected from discovery by a privilege which you wish to assert, identify the document and then state the privilege which you are asserting.

DOCUMENTS

1. Any and all documents pertaining to the Plaintiff, Robert Stoud, including, but not limited to, his personnel file.
2. Any and all documents relating to the chain of command in Susquehanna County government.
3. Any and all documents related to Susquehanna County's policies and procedures regarding sexual harassment and harassment.
4. Any and all organizational charts for Susquehanna County government.
5. Any and all documents related to Susquehanna County's progressive discipline policy.

6. Any and all disciplinary documents related to the Plaintiff.
7. Copy of Commissioners' Meeting minutes and Salary Board Meeting minutes from 2012 through the present.
8. A copy of Susquehanna County's policies and procedures manual.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
Bar I.D. # PA 49625
gmk@mkpvlaw.com

/s/ Christopher J. Szewczyk, Esquire
Bar I.D. # PA 306689
cjs@mkpvlaw.com
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
P: (570) 348-0776
F: (570) 348-2755

Date: August 17, 2018

CERTIFICATE OF SERVICE

I, Christopher J. Szewczyk, Esquire, hereby certify that on August 17, 2018, I served a true and correct copy of the foregoing document to the following via electronic mail:

A James Hailstone
jhailstone@kbh-law.com

/s/ Christopher J. Szewczyk, Esquire
Christopher J. Szewczyk, Esquire
Attorney for the Plaintiff